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Attorneys for Defendants GotNews, LLC & Chares C. Johnson

## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN **SOUTHERN DIVISION**

JOEL VANGEHLUWE, et al.,

Plaintiffs,

v.

GOTNEWS, LLC, et. al.

Defendants.

Case No.: 2:18-cv-10542-LJM-EAS

DEFENDANTS GOTNEWS, LLC AND CHARLES JOHNSON'S MOTION FOR SANCTIONS

Defendants Charles Johnson and GotNews, LLC (collectively, "GotNews Defendants"), hereby move this Court to sanction plaintiff pursuant to the Court's inherent authority.

## **BRIEF IN SUPPORT OF MOTION FOR SANCTIONS**

Mr. Sommerman was well aware that lead counsel for the GotNews Defendants was out of the office due to a serious illness. (*See* Dkt. No. 43-2.) Yes, when asked, counsel for the Defense told Mr. Sommerman that he would try to finish the joint report in a week. Today is three days past that aspirational deadline. Rather than communicate with the undersigned, Sommerman simply filed the "joint" report himself, despite the Court's order.

The only sanction sought is that the report (Dkt. No. 43) be rejected, and Mr. Sommerman be compelled to comport himself professionally – and when delay is the result of illness, not inattention, he at the very least be required to pick up the telephone before trying to engage in such tactics as he has engaged in today.

The proper joint report can be completed within about 48 hours.

Dated: June 20, 2018 Respectfully Submitted,

/s/ Marc J. Randazza
Marc J. Randazza
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Attorneys for Defendants
GotNews, LLC & Chares C. Johnson

Case No. 2:18-cv-10542-LJM-EAS

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on June 20, 2018, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I further certify that a true and correct copy of the foregoing document being served via transmission of Notices of Electronic Filing generated by CM/ECF.

Respectfully Submitted,

Employee,

Randazza Legal Group, PLLC